

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>TONY DEWAYNE MOORE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO.: 2:07-cv-964-MHT</b>
	)	
<b>MIKE MULL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

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<b>TONY DEWAYNE MOORE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO.: 2:07-cv-974-WKW</b>
	)	
<b>MIKE MULL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME**

COME NOW Coosa County Commission, Coosa County Sheriff Terry Wilson, Coosa County Jail Administrator Mike Mull, and Corrections Officer Ashley Cowart, Defendants in the above-styled cause, and move the Court for an Order granting the Defendants a thirty (30) day extension of time in which to file their Answer and Special report. In support thereof, the Defendants state as follows:

1. The Plaintiff has brought two nearly identical 42 U.S.C. § 1983 actions against identical Defendants.
2. In light of this the Defendants have filed a motion to consolidate the two cases.
3. The Plaintiff's claims include denial of medical care claims.

4. However, counsel has learned that the Plaintiff has received a significant amount of medical care from at least three medical care providers.

5. Because of this, Defendants will be moving separately for a qualified HIPAA Order in order to subpoena the Plaintiff's medical records.

6. Counsel for the Defendants anticipates that it will take an additional thirty days to obtain the necessary orders (consolidation and HIPAA), subpoena the relevant medical records, and complete the Defendants' special report.

7. The Defendants have not previously requested or received an extension of time in either case.

**WHEREFORE, premises considered,** Defendants move for an Order granting an extension of time in this matter.

Respectfully submitted this 6th day of December, 2007.

**s/Gary L. Willford, Jr.**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this the **6th** day of **December, 2007**, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that I have mailed a true and correct copy of the foregoing by United States Mail, postage prepaid, to the following non-CM/ECF participant:

Tony Moore  
Coosa County Jail  
P.O. Box 279  
Rockford, Alabama 35136

**s/Gary L. Willford, Jr.**  
OF COUNSEL